

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

EBONY QUEEN

PLAINTIFF

VS.

CIVIL ACTION NO.

18-558

MOHAN SINGH JUGAIT, INC.
MOHAN SINGH JUGAIT; and
JOHN DOES 1 - 5

DEFENDANTS

COMPLAINT

COMES NOW, the Plaintiff, Ebony Queen, by and through her attorney and files this Complaint against the Defendants, Mohan Singh Jugait, Inc., (hereinafter "MSJI"), Mohan Singh Jugate, (hereinafter "Mohan Singh") and John Does 1-5 and in support of this suit, Plaintiff would show the following facts:

PARTIES

1.

Plaintiff, Ebony Queen, is an adult resident citizen of Hinds County, Mississippi whose residential address is 266 Englewood Street, Jackson, Mississippi.

2.

Defendant, Mohan Singh Jugait, Inc., is a Virginia corporation with its principle place of business at 1600 East Jefferson Court, Sterling, VA 20164. Mohan Singh Jugait Inc., may be served with process by service upon its Registered Agent, Mohan Singh Jugait, 1600 East Jefferson Court, Sterling, VA 20164.

3.

Defendant, Mohan Singh Jugait, is an adult resident citizen of Loudoun County, Virginia, whose residential address is 1600 East Jefferson Court, Sterling, VA 20164, where he may be served with process of this Court.

EXHIBIT A

4.

Defendants, John Does 1 through 5 are individuals whose names and addresses of residences are unknown.

JURISDICTION AND VENUE

5.

This civil action arises out of the negligent acts and omissions of Defendants committed in the State of Mississippi against a resident of the State of Mississippi.

6.

This Court has in personal jurisdiction over Defendants pursuant to §13-3-57 of the Mississippi Code.

7.

Venue is proper in the First Judicial District of Hinds County, Mississippi in that the cause of action occurred in the First Judicial District of Hinds County, Mississippi pursuant to §11-11-3 of the Mississippi Code.

FACTS

8.

On or about March 20, 2017, Plaintiff was traveling eastbound on I-20 in the First Judicial District of Hinds County, Mississippi. At the same time John Doe 1 was traveling eastbound on I-20 when he/she swerved into the lane of Plaintiff and forced Plaintiff's vehicle off the roadway into a tree.

While responsible for the management and control of his/her vehicle, John Doe 1 was careless, negligent, grossly negligent and reckless, by swerving his/her vehicle into the lane of Plaintiff on I-20.

9.

At the above mentioned time and place, John Doe 1 was the employee or agent of Mohan Singh and MSJI and was acting in the furtherance of the business of Mohan Singh and MSJI and within the scope of his/her employment or agency.

10.

Defendants, Mohan Singh and MSJI, is liable for the negligent, gross negligent and reckless acts of its employee or agent, John Doe 1.

11.

At all times relevant, Plaintiff did not contribute to the collision in any manner.

NEGLIGENCE AND GROSS NEGLIGENCE OF JOHN DOE 1

12.

Disregarding his/her duty as a motorist, John Doe 1, was guilty of one or more of the following:

- a. Failure to operate said vehicle with due care and caution for the safety of Ebony Queen;
- b. Failure to properly control his/her vehicle;
- c. Failure to keep a proper look-out and be on the alert;
- d. Driving at an unreasonable rate of speed;
- e. Failure to keep a safe distance between his vehicle and other vehicles;

- f. Negligently and careless creating a hazardous condition; and
- g. Other negligent acts or omissions of the Defendant.

NEGLIGENCE AND GROSS NEGLIGENCE OF MOHAN SINGH JUGAIT

13.

Defendant, Mohan Singh, before and at the time of the collision herein, was guilty of intentional, willful, unlawful, reckless, and/or negligent acts and/or omissions which include but are not necessarily limited to the following:

- a. Hiring and retaining John Doe 1;
- b. Failing to properly train John Doe 1;
- c. Failing to develop and maintain a fleet management program;
- d. Violating state and federal laws and regulations as to the operation of commercial trucks;
- e. Failing to develop, implement, and/or enforce reasonable and prudent safety policies for the protection and safety of the public;
- f. Failing to adhere to and abide by federal and state laws and regulations in regard to the maximum number of driving hours and hours of work for drivers;
- g. Failing to perform an adequate pre-employment background check before hiring John Doe 1;
- h. Negligent entrustment of its commercial vehicle to John Doe 1; and
- i. Other acts of negligence.

NEGLIGENCE AND GROSS NEGLIGENCE OF MOHAN SINGH JUAGAIT, INC.

14.

Defendant, MSJI, before and at the time of the collision herein, was guilty of

intentional, willful, unlawful, reckless, and/or negligent acts and/or omissions which include but are not necessarily limited to the following:

- a. Hiring and retaining John Doe 1;
- b. Failing to properly train John Doe 1;
- c. Failing to develop and maintain a fleet management program;
- d. Violating state and federal laws and regulations as to the operation of commercial trucks;
- e. Failing to develop, implement, and/or enforce reasonable and prudent safety policies for the protection and safety of the public;
- f. Failing to adhere to and abide by federal and state laws and regulations in regard to the maximum number of driving hours and hours of work for drivers;
- g. Failing to perform an adequate pre-employment background check before hiring John Doe 1;
- h. Negligent entrustment of its commercial vehicle to John Doe 1; and
- i. Other acts of negligence.

DAMAGES

15.

As a direct and proximate result of the concurrent negligent and gross negligent acts of Defendants, John Doe 1, Mohan Singh, and MSJI, Ebony Queen suffered severe injuries and incurred substantial damages and will continue to suffer in the future the following injuries and damages including but not limited to the following:

- a. Past, present and future doctor, hospital, drug, and medical bills;
- b. Past, present and future mental and emotional distress;

- c. Past, present and future physical pain and suffering;
- d. Past and future wage loss;
- e. Any other relief which the Court or jury deems just or appropriate based upon the circumstances.

16.

The aforesaid acts and omissions of Defendants, John Doe 1, Mohan Singh and MSJI, constitute intentional, willful, unlawful, reckless conduct and wanton disregard for the rights of Plaintiff, and for other members of the public utilizing the highways and roads and/or constitute gross negligence and recklessness as to show a total lack of regard for the rights of Plaintiff, and for other members of the public utilizing the highways and roads which entitles Plaintiff to recover punitive and exemplary damages against John Doe 1, Mohan Singh, and MSJI in an amount to be assessed by the Court and/or jury.

RELIEF DEMANDED

WHEREFORE, PREMISES CONSIDERED, Plaintiff, demands a judgment of and from Defendants, John Doe 1, Mohan Singh Jugait, and Mohan Singh Jugait, Inc., jointly and severally as follows:

- (a) Actual and compensatory damages;
- (b) Punitive damages;
- (c) Pre-judgment and post-judgment interest, and all costs accrued in this action; and
- (d) Any other relief which the Court or jury deems just and appropriate.

DATED: This the 25th day of September, 2018.

RESPECTFULLY SUBMITTED,

EBONY QUEEN

BY: /s/ LARRISSA C. MOORE
LARRISSA C. MOORE

OF COUNSEL:

LARRISSA C. MOORE, MSB #105402
JOE TATUM, MSB#10308
TATUM & WADE, PLLC
P. O. BOX 22688
JACKSON, MS 39225-2688
(601) 948-7770
LMOORE@TATUMANDWADE.COM
JNTATUM@AOL.COM

COVER SHEET		Court Identification Docket #		Case Year		Docket Number	
Civil Case Filing Form <i>(To be completed by Attorney/Party Prior to Filing of Pleading)</i>		ZS	J	CO	2018	SS8	
Mississippi Supreme Court Administrative Office of Courts		County # District	Judicial District	Court ID (CH, CI, CO)	Local Docket ID		
Form AOC/01 (Rev 2016)		Month	Date	Year	Case Number if filed prior to 1/1/94		
In the CIRCUIT		Court of HINDS		County	—	FIRST	Judicial District
Origin of Suit (Place an "X" in one box only)							
<input checked="" type="checkbox"/> Initial Filing		<input type="checkbox"/> Reinstated		<input type="checkbox"/> Foreign Judgment Enrolled		<input type="checkbox"/> Transfer from Other court	
<input type="checkbox"/> Remanded		<input type="checkbox"/> Reopened		<input type="checkbox"/> Joining Suit/Action		<input type="checkbox"/> Appeal	
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form							
Form Individual QUEEN		EBONY					
Last Name		First Name		Maiden Name, if applicable		M.I.	Jr/Sr/III/IV
Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____							
Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____							
Business							
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated							
Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____							
Address of Plaintiff							
Attorney (Name & Address) Larrissa C. Moore, Post Office Box 22688, Jackson, MS 39225-2688						MS Bar No. 105402	
Check (x) if Individual Filing Initial Pleading is NOT an attorney							
Signature of Individual Filing: 							
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form							
Individual JUGAIT		MOHAN				S	M.I.
Last Name		First Name		Maiden Name, if applicable		Jr/Sr/III/IV	
Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____							
Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____							
Business							
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated							
Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____							
Attorney (Name & Address) - If Known							
						MS Bar No. _____	
Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet							
Nature of Suit (Place an "X" in one box only)							
Domestic Relations		Business/Commercial		Children/Minors - Non-Domestic		Real Property	
<input type="checkbox"/> Child Custody/Visitation		<input type="checkbox"/> Accounting (Business)		<input type="checkbox"/> Adoption - Contested		<input type="checkbox"/> Adverse Possession	
<input type="checkbox"/> Child Support		<input type="checkbox"/> Business Dissolution		<input type="checkbox"/> Adoption - Uncontested		<input type="checkbox"/> Ejectment	
<input type="checkbox"/> Contempt		<input type="checkbox"/> Debt Collection		<input type="checkbox"/> Consent to Abortion		<input type="checkbox"/> Eminent Domain	
<input type="checkbox"/> Divorce:Fault		<input type="checkbox"/> Employment		<input type="checkbox"/> Minor Removal of Minority		<input type="checkbox"/> Eviction	
<input type="checkbox"/> Divorce: Irreconcilable Diff.		<input type="checkbox"/> Foreign Judgment		<input type="checkbox"/> Other		<input type="checkbox"/> Judicial Foreclosure	
<input type="checkbox"/> Domestic Abuse		<input type="checkbox"/> Garnishment		<input type="checkbox"/> Partition		<input type="checkbox"/> Lien Assertion	
<input type="checkbox"/> Emancipation		<input type="checkbox"/> Replevin		<input type="checkbox"/> Tax Sale: Confirm/Cancel		<input type="checkbox"/> Partition	
<input type="checkbox"/> Modification		<input type="checkbox"/> Other		<input type="checkbox"/> Title Boundary or Easement		<input type="checkbox"/> Other	
<input type="checkbox"/> Paternity		Probate		Civil Rights		Torts	
<input type="checkbox"/> Property Division		<input type="checkbox"/> Accounting (Probate)		<input type="checkbox"/> Elections		<input type="checkbox"/> Bad Faith	
<input type="checkbox"/> Separate Maintenance		<input type="checkbox"/> Birth Certificate Correction		<input type="checkbox"/> Expungement		<input type="checkbox"/> Fraud	
<input type="checkbox"/> Term. of Parental Rights-Chancery		<input type="checkbox"/> Mental Health Commitment		<input type="checkbox"/> Habeas Corpus		<input type="checkbox"/> Intentional Tort	
<input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA)		<input type="checkbox"/> Conservatorship		<input type="checkbox"/> Post Conviction Relief/Prisoner		<input type="checkbox"/> Loss of Consortium	
<input type="checkbox"/> Other		<input type="checkbox"/> Guardianship		<input type="checkbox"/> Other		<input type="checkbox"/> Malpractice - Legal	
Appeals		<input type="checkbox"/> Heirship		<input type="checkbox"/> Breach of Contract		<input type="checkbox"/> Malpractice - Medical	
<input type="checkbox"/> Administrative Agency		<input type="checkbox"/> Intestate Estate		<input type="checkbox"/> Installment Contract		<input type="checkbox"/> Mass Tort	
<input type="checkbox"/> County Court		<input type="checkbox"/> Minor's Settlement		<input type="checkbox"/> Insurance		<input type="checkbox"/> Negligence - General	
<input type="checkbox"/> Hardship Petition (Driver License)		<input type="checkbox"/> Munitiment of Title		<input type="checkbox"/> Specific Performance		<input checked="" type="checkbox"/> Negligence - Motor Vehicle	
<input type="checkbox"/> Justice Court		<input type="checkbox"/> Name Change		<input type="checkbox"/> Other		<input type="checkbox"/> Premises Liability	
<input type="checkbox"/> MS Dept Employment Security		<input type="checkbox"/> Testate Estate		<input type="checkbox"/> Declaratory Judgment		<input type="checkbox"/> Product Liability	
<input type="checkbox"/> Municipal Court		<input type="checkbox"/> Will Contest		<input type="checkbox"/> Injunction or Restraining Order		<input type="checkbox"/> Subrogation	
<input type="checkbox"/> Other		<input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)		<input type="checkbox"/> Other		<input type="checkbox"/> Wrongful Death	
						Other	

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT, CITY OF _____

Docket No. _____ - _____ Docket No. If Filed
 File Yr _____ Chronological No. _____ Clerk's Local ID _____
 Prior to 1/1/94 _____

**DEFENDANTS IN REFERENCED CAUSE - Page 1 of 1 Defendants Pages
 IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant #2:

Individual: _____ Last Name _____ First Name _____ (_____ Maiden Name, if Applicable _____) _____ Middle Init. _____ Jr/Sr/III/IV _____

Check () if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check () if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business MOHAN SINGH JUGAIT, INC.

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check () if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice () _____ Not an Attorney() _____

Defendant #3:

Individual: _____ Last Name _____ First Name _____ (_____ Maiden Name, if Applicable _____) _____ Middle Init. _____ Jr/Sr/III/IV _____

Check () if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

Check () if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check () if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice () _____ Not an Attorney() _____

Defendant #4:

Individual: _____ Last Name _____ First Name _____ (_____ Maiden Name, if Applicable _____) _____ Middle Init. _____ Jr/Sr/III/IV _____

Check () if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of _____

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Business _____

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D/B/A _____

ATTORNEY FOR THIS DEFENDANT: _____ Bar # or Name: _____ Pro Hac Vice () _____ Not an Attorney() _____

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

EBONY QUEEN

PLAINTIFF

VS.

CIVIL ACTION NO. 18-558

MOHAN SINGH JUGAIT, INC.
MOHAN SINGH JUGAIT; and
JOHN DOES 1 - 5

DEFENDANTS

SUMMONS

TO ANY SHERIFF OR OTHER PERSON AUTHORIZED TO SERVE PROCESS:

You are hereby commanded to Summons:

**Mohan Singh Jugait
1600 East Jefferson Court
Sterling, VA 20164**

NOTICE TO DEFENDANT

THE COMPLAINT WITH DISCOVERY ATTACHED WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

THIS ANSWER MUST BE FILED AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE WITHIN THIRTY (30) DAYS OF THE DATE YOU ARE SERVED OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

This the 1 day of October, 2018.

ZACK WALLACE, CLERK
CIRCUIT COURT OF HINDS COUNTY

BY: Karla Bailey

D. C.

ATTORNEY FOR PLAINTIFF
JOE TATUM, STATE BAR NO. 10308
TATUM & WADE, PLLC
P. O. BOX 22688
JACKSON, MS 39225-2688
(601) 948-7770



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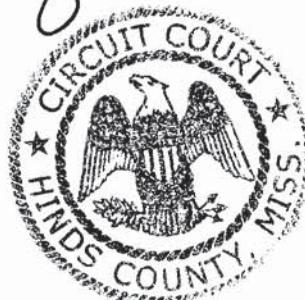
This the 1 day of October, 2018.

ZACK WALLACE, CLERK
CIRCUIT COURT OF HINDS COUNTY

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CIRCUIT COURT OF HINDS COUNTY

BY:

Karla Bailey D. C.

ATTORNEY FOR PLAINTIFF
JOE TATUM, STATE BAR NO. 10308
TATUM & WADE, PLLC
P. O. BOX 22688
JACKSON, MS 39225-2688
(601) 948-7770

ATTEST A TRUE COPY

OCT - 1 2018

ZACK WALLACE, CIRCUIT CLERK
Karla Bailey D.C.



RETURN

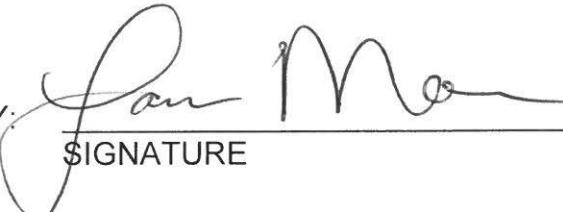
STATE OF MISSISSIPPI

COUNTY OF HINDS

I, LARRISSA MOORE, do hereby certify that I have this day served the Complaint, along with Plaintiff's First Set of Interrogatories, Request for Production and Request for Admissions to Mohan Singh Jugait at 1600 East Jefferson Court, Sterling, VA 20164 in the following manner: via certified mail with return receipt dated December 27, 2018

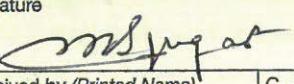
THIS, the 8th day of January, 2019.

BY:


SIGNATURE

ADDRESS

CITY STATE ZIP CODE

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">■ Complete items 1, 2, and 3.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.		<p>A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="text" value="Mohan Singh Jugait"/> C. Date of Delivery <input type="text" value="12/27/18"/></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below: <input type="text"/></p>	
<p>1. Article Addressed to: Via Certified Mail Mohan Singh Jugait 1600 East Jefferson Court Sterling, VA 20164</p> <p>9590 9402 4096 8092 7494 28</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
2. Article Number (Transfer from service label) 2017 1450 0002 0467 9146			

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c/o Mohan Singh Jugait, Registered Agent
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ATTEST A TRUE COPY

OCT - 1 2018

ZACK WALLACE CIRCUIT CLERK
BY Karla Bailey D.C.



RETURN

STATE OF MISSISSIPPI

COUNTY OF HINDS

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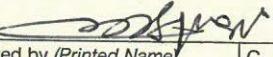
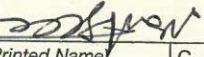
THIS, the 8th day of January, 2019.

BY:

SIGNATURE

ADDRESS

CITY STATE ZIP CODE

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">■ Complete items 1, 2, and 3.■ Print your name and address on the reverse so that we can return the card to you.■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: Via Certified Mail Mohan Singh Jugait, Inc. c/o Mohan Singh Jugait, Registered Agent 1600 East Jefferson Court Sterling, VA 20164		B. Received by (Printed Name)  C. Date of Delivery 12/27/18	
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
		<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
9. Article Number (Transfer from service label) 7017 1450 0002 0467 9153			
PS Form 3811, July 2015 PSN 7530-02-000-9053			
Domestic Return Receipt			